

F A X TRANSMITTAL

To: Diane Neilson - UDO&MFrom: Steve BrooksSubject: Draft Order to Reilly for your info-commentNumber of Pages: 4FAX Machine No.: 359-3940Date: 4/5/91Time: 1400

USO Log No.: \_\_\_\_\_

Comments:



Rob Pollack (John Fiit) - Indianapolis  
Glen Wadsworth - at plant

3500  
U-087809 thru  
U-087818  
(U-027)

Mr. Robert Polack  
Vice President and General Counsel  
1510 Market Square Center  
151 North Delaware Street  
Indianapolis, Indiana 46204

Dear Mr. Polack,

As you are aware the Salt Lake District, Bureau of Land Management has developed a memorandum of understanding with the USGS-Water Resource Division to study salt loss on the Bonneville Salt Flats. Reilly participated in the development of the salt flats study plan through active membership in the Bonneville Salt Flats Technical Review Committee and BSF Coalition.

In correspondence dated March 14, 1991 Reilly was requested to provide access to data and land as necessary to begin field work on the study (copy attached). Reilly has been non-responsive to the request for access and data. As provided by 43 CFR 3590 in general the authorized officer of the BLM may require data submissions and access to federal and private lands within a unit agreement. More specifically 43 CFR 3590.2(c) provides for inspection and regulation of such operation for the purpose of preventing waste of mineral substances or damage to formation and deposits containing them, or damage to other formations, deposits or nonmineral resources affected by the operation. As provided by 43 CFR 3592.1 (d)(2) The authorized officer may require a modification to the approved mining plan if conditions warrant.

Reilly has 30 days to provide the requested access and data. Failure of the operator/lessee to take action in accordance with this notification shall be grounds for the authorized officer to issue an order to cease operation or initiate legal proceeding to cancel the lease under 3509.4. Additionally if, in the judgement of the authorized officer, the failure to comply with the established requirements threatens immediate, serious or irreparable damage to the environment the authorized officer may, either in writing or orally with written confirmation, order the cessation of operations without prior notice.

Orders issued under the regulation may be appealed as provided in Title 43, Part 4. Orders shall be effective during the pendency of any appeal.

DM



3500  
(U-020)

MAR 14 1991

Mr. Robert Polack  
Vice President and General Counsel  
1510 Market Square Center  
151 North Delaware Street  
Indianapolis, Indiana 46204

Dear Mr. Polack:

As you requested by telephone from the Bureau of Land Management on March 11, 1991, the activities the U.S. Geological Survey (USGS) plans to conduct over the next 180 days are as follows:

1. Install a stage-recording station on the Federal lease ditch in the vicinity of booster pump #2 (adjacent to I-80) that lifts brine from the Federal lease ditch (east of the Bonneville Salt Flats) into the ditch that transports the brine to the evaporation pond system. This will consist of a stilling well about 18 inches in diameter with a metal box mounted on top to house a water-level recorder.
2. Measure the discharge from booster pump #2 using a flow measuring device during two or more different water levels in the canal.
3. Install a meter on the pump to record the time when the pump is operating.
4. Determine quantity of water withdrawn from wells on west side of Bonneville Salt Flats, about two miles north of I-80. This can be accomplished by (a) installing a stream-gaging station on the canal that transports the water, or (b) measuring the discharge and power consumption of the pumps on the wells and estimating the total quantity of water withdrawn by using yearly power-consumption records.
5. Install a water-level recorder on a shallow, four-inch well adjacent to the Federal-lease ditch, north of I-80.



Also, the USGS's data needs from Reilly Industries over the same 180 day time span are listed below:

1. Climatological data for the last 12 years at stations that Reilly installed near the evaporation ponds.
2. Chemical analyses for water in the Federal-lease ditch and from wells, shallow and deep, for the last 12 years
3. Water-level records for any shallow wells owned by Reilly located north and south of I-80 for the last 12 years.

If you have questions, feel free to call me on (801) 977-4300.

Sincerely,

Deane H. Zeller  
District Manager